

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA :  
:  
- v. - : **SEALED INDICTMENT**  
:  
UMAR SADIQ, : S1 18 Cr. 816  
a/k/a "Umar Sadiq Khan," :  
:  
and :  
RASHID MAHMOOD, :  
a/k/a "Rashid Mehmoood," :  
:  
:  
Defendants. :  
:  
- - - - - X

**COUNT ONE**

The Grand Jury charges:

1. From at least in or about 2017, up to and including in or about 2018, in the Southern District of New York, Thailand, Pakistan, and elsewhere, and in an offense begun and committed upon the high seas and elsewhere out of the jurisdiction of any particular State and district of the United States, UMAR SADIQ, a/k/a "Umar Sadiq Khan," and RASHID MAHMOOD, a/k/a "Rashid Mehmoood," the defendants, who will be first brought to and arrested in the Southern District of New York and whose point of entry into the United States will be the Southern District of New York, and others known and unknown, intentionally and knowingly did combine, conspire, confederate, and agree together and with each other to violate the narcotics laws of the United

States.

2. It was a part and an object of the conspiracy that UMAR SADIQ, a/k/a "Umar Sadiq Khan," and RASHID MAHMOOD, a/k/a "Rashid Mehmood," the defendants, and others known and unknown, would and did import into the United States and into the customs territory of the United States from a place outside thereof a controlled substance, in violation of Title 21, United States Code, Sections 952(a) and 960(a)(1).

3. It was further a part and an object of the conspiracy that UMAR SADIQ, a/k/a "Umar Sadiq Khan," and RASHID MAHMOOD, a/k/a "Rashid Mehmood," the defendants, and others known and unknown, would and did manufacture and distribute a controlled substance, intending, knowing, and having reasonable cause to believe that such substance would be unlawfully imported into the United States and into waters within a distance of 12 miles of the coast of the United States from a place outside thereof, in violation of Title 21, United States Code, Sections 959(a) and 960(a)(3).

4. The controlled substance that UMAR SADIQ, a/k/a "Umar Sadiq Khan," and RASHID MAHMOOD, a/k/a "Rashid Mehmood," the defendants, conspired to (i) import into the United States and into the customs territory of the United States from a place outside thereof, and (ii) manufacture and distribute, intending, knowing, and having reasonable cause to believe that such

substance would be unlawfully imported into the United States and into the waters within a distance of 12 miles of the coast of the United States from a place outside thereof, was one kilogram and more of mixtures and substances containing a detectable amount of heroin, in violation of Title 21, United States Code, Section 960(b)(1)(A).

5. In furtherance of the conspiracy, and to effect the illegal objects thereof, the following overt acts were performed, among others:

a. In or about July 2017, UMAR SADIQ, a/k/a "Umar Sadiq Khan," and RASHID MAHMOOD, a/k/a "Rashid Mehmood," the defendants, participated in meetings in Thailand, regarding shipments of heroin that were to be sent to the United States from Pakistan.

b. In or about October 2017, UMAR SADIQ, a/k/a "Umar Sadiq Khan," and RASHID MAHMOOD, a/k/a "Rashid Mehmood," the defendants, caused the delivery of approximately 845 grams of heroin to an address in Manhattan.

(Title 21, United States Code, Sections 959(d) and 963, Title 18, United States Code, Section 3238.)

**FORFEITURE ALLEGATIONS**

6. As a result of committing the offense alleged in Count One of this Indictment, UMAR SADIQ, a/k/a "Umar Sadiq Khan," and RASHID MAHMOOD, a/k/a "Rashid Mehmood," the defendants, shall forfeit to the United States, pursuant to

Title 21, United States Code, Sections 853 and 970, any and all property constituting, or derived from, any proceeds obtained, directly or indirectly, as a result of said offense and any and all property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, said offense, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offense.

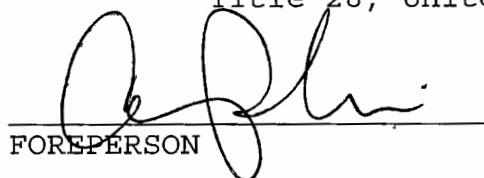
**SUBSTITUTE ASSET PROVISION**

7. If any of the above described forfeitable property, as a result of any act or omission of the defendant:

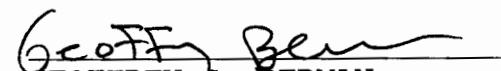
- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third person;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p) and Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of the defendant up to the value of the above forfeitable property.

(Title 21, United States Code, Sections 853 and 970; Title 28, United States Code, Section 2461.)



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FOREPERSON



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GEOFFREY S. BERMAN  
United States Attorney

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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

- v. -

UMAR SADIQ, a/k/a "Umar Sadiq Khan," and  
RASHID MAHMOOD, a/k/a "Rashid Mehmood,"

Defendants.

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INDICTMENT

S1 18 Cr. 816

(21 U.S.C. § 959(d) and 963; 18 U.S.C. §  
3238.)

GEOFFREY S. BERMAN  
United States Attorney.

A TRUE BILL

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AQRW  
Foreperson.

12/4/18

Filed sealed indictment.  
Arrest Warrants Issued.

- USMJ Wong